

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

THE SOUTH CAROLINA STATE)
CONFERENCE OF THE NAACP and)
TAIWAN SCOTT, on behalf of himself)
and all other similarly situated persons,)

Plaintiffs,)

vs.)

HENRY D. MCMASTER, in his official)
capacity as Governor of South Carolina;)
HARVEY PEELER, in his official capacity)
as President of the Senate; LUKE A.)
RANKIN, in his official capacity as)
Chairman of the Senate Judiciary)
Committee; JAMES H. LUCAS, in his)
official capacity as Speaker of the House of)
Representatives; CHRIS MURPHY, in his)
official capacity as Chairman of the House)
of Representatives Judiciary Committee;)
WALLACE H. JORDAN, in his official)
capacity as Chairman of the House of)
Representatives Election Law)
Subcommittee; HOWARD KNABB, in his)
official capacity as interim Executive)
Director of the South Carolina State Election)
Commission, JOHN WELLS, JOANNE)
DAY, CLIFFORD J. ELDER, LINDA)
MCCALL and SCOTT MOSELEY, in their)
official capacities as members of the South)
Carolina State Election Commission,)

Defendants.)

Civil Action No.: 3:21-cv-03302-JMC

**SENATE DEFENDANTS HARVEY
PEELER AND LUKE A. RANKIN'S
ANSWERS TO LOCAL RULE 26.01
INTERROGATORIES**

Defendants Harvey Peeler, in his official capacity as President of the Senate, and Luke A. Rankin, in his official capacity as Chairman of the Senate Judiciary Committee (collectively “Senate Defendants”), by and through the undersigned attorneys, answer the Local Rule 26.01 Interrogatories as follows:

1. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: The Senate Defendants are unaware of any such persons or entities.

2. As to each claim, state whether it should be tried jury or non-jury and why.

RESPONSE: This case should be tried nonjury given that Plaintiffs are seeking a declaratory judgment and injunctive relief.

3. State whether the party submitting these responses is a publicly owned company and separately identify: (a) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (b) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (c) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: Not applicable.

4. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: The Senate Defendants agree the Columbia Division of the District of South Carolina is appropriate for the trial of this matter because the redistricting plans under challenge were enacted and ratified at the State House in Columbia, South Carolina. The same will be true of the new reapportionment plans on which the South Carolina General Assembly is actively working.

5. Is this action related in whole or in part to any other matter filed with this District, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they

are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: The Senate Defendants are not aware of any other related matter.

6. If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: Not applicable.

7. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE: Not applicable.

(Signature page to follow)

October 28, 2021

Respectfully submitted,

s/Robert E. Tyson, Jr.

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Vordman Carlisle Traywick, III (12483)

La’Jessica Stringfellow (13006)

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**Pro hac vice application forthcoming*